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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 IN RE JUNIPER NETWORKS, INC.
21 SECURITIES LITIGATION

No. C06-04327-JW

**DECLARATION OF DAVID C.
HARRISON IN SUPPORT OF LEAD
PLAINTIFF'S SUPPLEMENTAL
SUBMISSION IN SUPPORT OF MOTION
FOR SANCTIONS AGAINST
DEFENDANT ERNST & YOUNG**

Date: March 2, 2010
Time: 10:00 am
BEFORE: Hon. Patricia V. Trumbull

1 I, DAVID HARRISON, declare pursuant to 28 U.S.C. § 1746 that:

2 1. I am a shareholder with the law firm of Lowey Dannenberg Cohen & Hart, P.C.,
3 counsel of record for Lead Plaintiff NYC Pension Funds ("Lead Plaintiff"). I make this
4 declaration in support of Lead Plaintiff's Supplemental Submission In Support Of Motion For
5 Sanctions Against Defendant Ernst & Young ("Supplemental Submission"). I have personal
6 knowledge of the facts set forth below, and, if called as a witness, could and would testify
7 competently thereto.

8 2. On November 11, 2009, the day before filing its motion for sanctions, counsel for
9 Lead Plaintiff, Barbara Hart and David Harrison met and conferred with counsel for E&Y via
10 telephone to discuss E&Y's massive late production of documents. During the meet and confer,
11 Ms. Hart conveyed to E&Y's counsel that Lead Plaintiff intended to file a motion for sanctions
12 against E&Y.

13 3. Attached hereto as Exhibit 1 is a true and correct copy of a document titled "Audit
14 Considerations Checklist for 2006 Audit Engagements" (EY-JNPR-TEAM-043316-37).

15 4. Attached hereto as Exhibit 2 is a true and correct copy of a document titled "Risks
16 for which Controls Must Be Addressed" dated 12/31/2006 (EY-JNPR-DF-KKAN-018952-57).

17 5. Attached hereto as Exhibit 3 is a true and correct copy of hand-written notes titled
18 "Juniper Options Review (EY-JNPR-TEAM-042410-11).

19 6. Attached hereto as Exhibit 4 is a true and correct copy of 1/2/2007 email from
20 Robert Browne to Ginnie Carlier re "Fw: OCA letters/technical memoranda and meetings with
21 National", and attached forwarded emails therein (EY-JNPR-DF-SLAZ-041328-30).

22 7. Attached hereto as Exhibit 5 is a true and correct copy of a document titled "Draft
23 Integrated Audit Results & Communications Report to the Audit Committee of the Board of
24 Directors" dated 2/27/2007 (EY-JNPR-DF-KKAN-002125-63).

25 8. Attached hereto as Exhibit 6 is a true and correct copy of hand-written notes (EY-
26 JNPR-TEAM-040909).

9. Attached hereto as Exhibit 7 is a true and correct copy of a chart identifying E&Y personnel privy to information about Juniper/NetScreen Merger, with handwriting (EY-JNPR-TEAM-038826-28).

10. Attached hereto as Exhibit 8 is a true and correct copy of Listing of Regulatory Communications with SEC/DOJ NASDAQ regarding stock options investigation (EY-JNPR-DF-FMIH-148867).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of February, 2010 in White Plains, New York.

/s/ David Harrison
DAVID HARRISON